

J Christopher Jorgensen
Nevada Bar No. 5382
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Phone: (702) 474-2642
Fax: (702) 216-6178
Email: cjorgensen@lrrc.com

*Attorneys for Defendant
Barclays Bank Delaware*

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com

*Attorneys for Plaintiff
Maria C. Van Zandt*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARIA C. VAN ZANDT,

Plaintiff,

vs.

QUANTUM COLLECTIONS, INC.;
BARCLAYS BANK, DELAWARE;
FORD MOTOR CREDIT-OMAHA
SERVICE CENTER; FORD MOTOR
CREDIT COMPANY; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION
SOLUTIONS, INC..

Defendants.

Case No.: 2:16-cv-01116-APG-NJK

STIPULATION TO EXTEND DEFENDANT BARCLAYS BANK DELAWARE'S TIME TO RESPOND TO COMPLAINT

(FIRST REQUEST)

Compl. Filed: May 18, 2016

This Stipulation to Extend Time to Respond to Complaint is made by and between Plaintiff Maria C. Van Zandt (“Plaintiff”) and Defendant Barclays Bank Delaware (“Barclays”) through their respective counsel, in light of the following facts:

RECITALS

A. Plaintiff filed the Complaint (“Complaint”) against Barclays on or about May 18, 2016.

B. Barclays was served with the Complaint on June 7, 2016.

C. Barclays' current deadline to respond is June 28, 2016.

D. The parties agreed to extend Barclays' time to respond to the Complaint through July 26, 2016, in order to give Barclays time to investigate Plaintiff's claims and prepare a proper response, and for the parties to discuss a potential resolution of this matter.

E. There is good cause to grant this stipulation because Barclays requires additional time to investigate Plaintiff's claims and prepare a proper response, and the parties require additional time to consider a resolution of this matter.

F. Pursuant to Civil Local Rules 6.2 and 7.1, Plaintiff and Barclays respectfully request that the Court extend Barclays' time to respond to Plaintiff's Complaint through July 26, 2016.

111

111

///

111

///

111

111

111

STIPULATION

NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays has up to and including July 26, 2016, to file a response to Plaintiff's Complaint.

IT IS SO STIPULATED.

DATED: June 28, 2016

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ J Christopher Jorgensen
J Christopher Jorgensen
Attorneys for Defendant
Barclays Bank Delaware

DATED: June 28, 2016

HAINES & KRIEGER, LLC

By: /s/ David H. Krieger
David H. Krieger, Esq.
Attorneys for Plaintiff
Maria C. Van Zandt

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATE: June 30, 2016